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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 00-0505 (WHA)
Plaintiff,)
v.) STIPULATION AND
CHARLES W. McCALL, Jr.,)
Defendant.)
) PROPOSED ORDER
EXTENDING TIME TO RESPOND
TO DEFENDANT'S MOTION
PURSUANT TO 28 U.S.C. § 2255

WHEREAS, on or about June 18, 2013, the defendant moved to vacate his sentence pursuant to 28 U.S.C. § 2255.

WHEREAS, on or about June 24, 2013, the Court ordered the government to show cause within “sixty days” or by August 24, 2013 why the motion should not be granted.

WHEREAS, undersigned counsel for the government has been scheduled to try two other cases that are related to a long-standing insider trading investigation beginning August 26, 2013 (*United States v. Bayyouk*, Case No. CR 12-0420 EMC) and beginning September 16, 2013 (*United States v. Salman*, Case No. CR 11-0625 EMC) and anticipates that he will be fully engaged in these trials through at least October 4, 2013.

WHEREAS, counsel for the government therefore requests an adjournment of the

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO DEFENDANT'S MOTION PURSUANT TO 28 U.S.C. § 2255, CASE NO. CR 00-0505 (WHA)

1 government's time to answer the defendant's pending motion until October 24, 2013.

2 WHEREAS, counsel for the defendant consents to an adjournment until only September
3 24, 2013 but will not consent to an adjournment until October 24, 2013.

4 STIPULATED AND AGREED TO:

5 DATED: August 9, 2013

MELINDA HAAG
United States Attorney

6 /s/
7

8 Adam A. Reeves
9 Assistant United States Attorney

10 DATED: August 9, 2013

11 /s/
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13 William L. Osterhoudt, Esq.
14 Law Offices of William L. Osterhoudt
15 Counsel for Defendant

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17 **ORDER**

18 PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN,

19 IT IS SO ORDERED THAT the government's time to respond to the defendant's
20 motion to vacate pursuant to 28 U.S.C. § 2255 shall be extended until October 24, 2013.

21 Dated: August 14, 2013



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23 Hon. William H. Alsup
24 United States District Judge
25 Northern District of California

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28 STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO
DEFENDANT'S MOTION PURSUANT TO 28 U.S.C. § 2255, CASE NO. CR 00-0505 (WHA)